

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a Delaware corporation,	)	Case No. 16-cv-1054 (WMW/DTS)
	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
FEDERAL INSURANCE COMPANY, an Indiana corporation, and ACE AMERICAN INSURANCE COMPANY, a Pennsylvania corporation.	)	
	)	
	)	
Defendants.	)	

**JOINT MOTION REGARDING CONTINUED SEALING**

Documents have been filed under temporary seal in connection with Defendants' Motion for Leave to File Amended Answer, Dkt. Nos. 458, 460, 460-1 through 460-14, 464, 465, 468, and 471. Pursuant to Local Rule 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	MARK 'X' IN APPLICABLE COLUMN			NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
			Parties Agree Doc. Should Remain Sealed	Parties Agree Doc. Should Be Unsealed	Parties Disagree		
458		Memorandum of Law in Support of Defendants' Motion for Leave to File Amended Answer – Only First Page Filed in Error, Refiled at Dkt. 464		X		N/A	The Parties agree there is no confidential information in this document. The document should be unsealed.
460		Exhibit A to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer – Only First Page Filed in Error, Refiled at Dkt. 465		X		N/A	The Parties agree there is no confidential information in this document. The document should be unsealed.
460-1		Exhibit 1 to Declaration of Terrence	X			N/A	Defendants contend this document should remain sealed. Defendants will file a

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		Fleming in Support of Defendants' Motion for Leave to File Amended Answer					redacted version of this document forthwith. This contract was filed under seal to protect the Parties' commercially confidential information. This commercially confidential information includes the terms of the Software License Agreement that is the subject of this dispute. The license agreement was designated as Confidential by Plaintiff under the Protective Order.
460-2		Exhibit 2 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This document was filed under seal to protect the Parties' commercially confidential information.
460-3		Exhibit 3 to Declaration of	X			N/A	This document should remain sealed. This document was

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		Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer					filed under seal to protect the Parties' commercially confidential information.
460-4		Exhibit 4 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This document was filed under seal to protect the Parties' commercially confidential information.
460-5		Exhibit 5 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended		X		N/A	The Parties agree there is no confidential information in this exhibit. It should be unsealed.

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		Answer					
460-6		Exhibit 6 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This document was filed under seal to protect the Parties' commercially confidential information. This commercially confidential information includes the terms of the Software License Agreement that is the subject of this dispute. The license agreement was designated as Confidential by Plaintiff under the Protective Order.
460-7		Exhibit 7 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This document was filed under seal to protect the Parties' commercially confidential information.
460-8		Exhibit 8 to Declaration of Terrence	X			N/A	This document should remain sealed. This deposition transcript was filed under seal

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		Fleming in Support of Defendants' Motion for Leave to File Amended Answer					to protect the Parties' commercially confidential information.
460-9		Exhibit 9 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This deposition transcript was filed under seal to protect the Parties' commercially confidential information.
460-10		Exhibit 10 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This expert damages report was filed under seal to protect the Parties' commercially confidential information.

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460-11		Exhibit 11 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This deposition transcript was filed under seal to protect the Parties' commercially confidential information.
460-12		Exhibit 12 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This expert report was filed under seal to protect the Parties' commercially confidential information.
460-13		Exhibit 13 to Declaration of Terrence Fleming in Support of Defendants' Motion for	X			N/A	This document should remain sealed. This expert damages report was filed under seal to protect the Parties' commercially confidential information.

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		Leave to File Amended Answer					
460-14		Exhibit 14 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This deposition transcript was filed under seal to protect the Parties' commercially confidential information.
464		Memorandum of Law in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. Defendants will file a redacted version of this motion forthwith. This motion was filed under seal to protect the Parties' commercially confidential information. This motion also contains excerpts and quotations from documents and depositions that the parties have designated Confidential, Attorneys' Eyes Only under the Protective



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							Order because they contain the Parties' confidential business information.
465		Exhibit A to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. Defendants will file a redacted version of this document forthwith. The unredacted version of this document was filed under seal to protect the Parties' commercially confidential information.
468		Fair Isaac Corporation's Opposition to Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. Plaintiff will file a redacted version of this document forthwith. This motion was filed under seal to protect the Parties' commercially confidential information.
471		Exhibit 1 to Declaration of Allen W. Hinderaker in	X			N/A	This document should remain sealed. This deposition transcript was filed under seal to protect the Parties'

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		Support of Fair Isaac Corporation's Opposition to Defendant's Motion for Leave to File Amended Answer					commercially confidential information.
471-1		Exhibit 2 to Declaration of Allen W. Hinderaker in Support of Fair Isaac Corporation's Opposition to Defendant's Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This deposition transcript was filed under seal to protect Defendants' commercially confidential information.
471-2		Exhibit 3 to Declaration of Allen W. Hinderaker in Support of Fair	X			N/A	This expert report should remain sealed. This report was filed under seal to protect the Parties' commercially confidential information.

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		Isaac Corporation's Opposition to Defendant's Motion for Leave to File Amended Answer					
471-3		Exhibit 5 to Declaration of Allen W. Hinderaker in Support of Fair Isaac Corporation's Opposition to Defendant's Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This email transcript was filed under seal to protect the Parties' commercially confidential information.
471-4		Exhibit 6 to Declaration of Allen W. Hinderaker in Support of Fair Isaac	X			N/A	This document should remain sealed. This email transcript was filed under seal to protect the Parties' commercially confidential information.

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		Corporation's Opposition to Defendant's Motion for Leave to File Amended Answer					
471-5		Exhibit 7 to Declaration of Allen W. Hinderaker in Support of Fair Isaac Corporation's Opposition to Defendant's Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This email transcript was filed under seal to protect the Parties' commercially confidential information.
471-6		Exhibit 10 to Declaration of Allen W. Hinderaker in Support of Fair Isaac Corporation's	X			N/A	This document should remain sealed. This interrogatory answer was filed under seal to protect the Defendants' commercially confidential information.

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		Opposition to Defendant's Motion for Leave to File Amended Answer					
471-7		Exhibit 11 to Declaration of Allen W. Hinderaker in Support of Fair Isaac Corporation's Opposition to Defendant's Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This email was filed under seal to protect the Parties' commercially confidential information.
471-8		Exhibit 12 to Declaration of Allen W. Hinderaker in Support of Fair Isaac Corporation's Opposition to	X			N/A	This document should remain sealed. This email was filed under seal to protect the Parties' commercially confidential information.

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		Defendant's Motion for Leave to File Amended Answer					

Dated: September 5, 2019

/s/ Joseph Dubis

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Allen Hinderaker, MN Bar # 45787  
Heather Kliebenstein, MN Bar # 337419  
Michael A. Erbele, MN Bar # 393635  
Joseph Dubis, MN Bar # 0398344  
MERCHANT & GOULD P.C.  
3200 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402-2215  
Tel: (612) 332-5300  
Fax: (612) 332-9081  
ahinderaker@merchantgould.com  
hkliebenstein@merchantgould.com  
merbele@merchantgould.com  
jdubis@merchantgould.com

***Attorneys for Plaintiff***

-AND-

/s/ Christopher D. Pham

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Terrence J. Fleming (#0128983)  
tfleming@fredlaw.com  
Leah C. Janus (#0337365)  
ljanus@fredlaw.com  
Christopher D. Pham (#0390165)  
cpham@fredlaw.com  
**FREDRIKSON & BYRON, P.A.**  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402-1425  
(612) 492-7000 (tel.)  
(612) 492-7077 (fax)

***Attorneys for Defendants***